



WACHTELMISSRY

Steven J. Cohen
Partner
212 909-9505 DIR TEL
212 909-9463 DIR FAX
cohen@wmlp.com

WWW.WMLLP.COM

One Dag Hammarskjöld
885 SECOND AVENUE
NEW YORK NY 10017
MAINTel 212 909-9500
FACSIMILE 212 371-0320

September 22, 2022

VIA ECF AND EMAIL

Hon. Andrew L. Carter Jr.
United States District Court
Southern District of New York
40 Foley Square
Courtroom 1306
New York, NY 10007
ALCarterNYSDChambers@nysd.uscourts.gov

Re: *Samuel Lopez v. 1-7 Clinton LLC and My Green Corner, Inc.*
SDNY Case No. 1:21-CV-10661 (ALC)

Dear Judge Carter:

This firm represents defendant My Green Corner, Inc. ("MGC") in the above-referenced action. This letter application is joined by Littler Mendelson, P.C., counsel for defendant 1-7 Clinton LLC ("Clinton").

We respectfully request that the Court extend MGC's and Clinton's time to respond to the First Amended Complaint filed by plaintiff Samuel Lopez ("Plaintiff") from September 23, 2022 to and including October 13, 2022. This is MGC's fourth request to extend the time to respond to the First Amended Complaint and Clinton's fifth request. The purpose of this extension is to provide MGC and Clinton additional time to consult with their retained ADA expert, which expert has conducted a site inspection and is assisting defendants in evaluating Plaintiff's claims in order to facilitate a resolution of this action. Plaintiff's counsel, Maria-Costanza Barducci, consents to this request for an extension. The requested extension does not affect any other scheduled dates in this action.

Accordingly, we respectfully request that the Court "so-order" this letter and e-file same on ECF to confirm the new date for MGC's and Clinton's response to the First Amended Complaint

Respectfully submitted,



Steven J. Cohen

cc: All Counsel of Record